REMARKS

In accordance with the foregoing, claims 1-7, 9-13, 15-17, 19-25, 27-29, 32, 34-36, 39, 40, 42-44, and 47 have been amended.

Claims 1-47 are pending and under consideration.

CONSIDERATION OF IDS

Attached to the Office Action, form PTO-1449 form was attached where only the foreign patent documents were initialized. However, the other references included in items AM and AN were not considered, that is, were not initialized by Examiner Truong. Partial English translations were provided in the Supplemental IDS filed on March 25, 2002. Accordingly, it is respectfully requested that Examiner Truong consider both references by initializing the form PTO-1449. A copy of the Supplemental IDS filed on March 25, 2002 and PTO-1449 form corresponding to the IDS filed on February 13, 2002 are enclosed with the present Amendment for the Examiner's consideration.

REJECTION UNDER 35 U.S.C. § 102:

In the Office Action, at page 2, claims 1, 4, 6, 7, 10, 12, 13, 16, 18, 19, 22, 24, 25, 28, 30-32, 35, 38, and 37 were rejected under 35 U.S.C. § 102 in view of U.S. Patent No. 6, 438,556 to Malik et al. ("Malik"). This rejection is traversed and reconsideration is requested.

Malik generally describes a system and method to compress data on a computer system. See abstract. The method of Malik separates the data into a plurality of segments, provides code words, each corresponding to a segment of the plurality of segments, and provides a representation of the data; the representation includes the code words, which replace the segments. However, Malik fails to teach or suggest, "dividing data and index data into a plurality of sections, wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Further, the cited reference is silent as to teaching or suggesting that "each of the sections comprises the data and the index data, and the data comprises at least one of text data, image data, and audio data," as recited in independent claim 1. Malik fails to teach or suggest all the claimed features recited in independent claim 1. Accordingly, it is respectfully requested that independent claim 1 and related dependent claims be allowed.

Because independent claims 7 and 13 include similar claim features as those recited in

independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7 and 13. It is respectfully requested that independent claims 7 and 13 and related dependent claims be allowed.

Independent claim 19 recites, "a region storing a compressed file which is divided into a plurality of sections which are compressed using a plurality of compression parameters; and a region storing address information of the sections and the compression parameters thereof, wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data." Independent claim 25 recites, "a reading step which accesses a storage medium which stores a plurality of compression parameters, address parameters, and a compressed file, an original file being divided into a plurality of sections . . . , wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data." Further, independent claim 32 recites, "a reading process section to control an access to a storage medium which stores a plurality of compression parameters, address parameters, and a compressed file, an original file being divided into a plurality of sections . . . , wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data." Because independent claims 19, 25, and 32 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 19, 25, and 32. It is respectfully requested that independent claims 19, 25, and 32 and related dependent claims be allowed.

REJECTION UNDER 35 U.S.C. § 103:

In the Office Action, at page 5, claims 2, 8, 14, 20, 26, and 33 were rejected under 35 U.S.C. § 103 in view of Malik and U.S. Patent No. 5,951,623 to Reynar et al. ("Reynar"). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Because claims 2, 8, 14, 20, 26, and 33 depend from independent claims 1, 7, 13, 19,

25, and 32, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claims 1, 7, 13, 19, 25, and 32 in view of Malik are incorporated herein.

Referring to Reynar, the reference provides an adaptive compression technique that is an improvement to Lempel-Ziv compression techniques to reduce transmission time of data from point to point. Once most frequent "words" for each type of the data are discovered, a dictionary for each type of data can be created. See column 14, lines 13-18 of Reynar. This dictionary, in conjunction with an initially empty dictionary, to which new "words" will be added, will then be used to perform the Lempel-Ziv compression. However, similarly to Malik, Reynar fails to teach or suggest, "dividing data and index data into a plurality of sections, wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Further, the cited reference is silent as to teaching or suggesting that "each of the sections comprises the data and the index data, and the data comprises at least one of text data, image data, and audio data," as recited in independent claim 1. Thus, assuming, arguendo, that Malik and Reynar were combined, the combination thereof would fail to teach or suggest all the claimed features recited in independent claim 1.

Because independent claims 7, 13, 19, 25, and 32 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7, 13, 19, 25, and 32. It is respectfully requested that independent claims 1, 7, 13, 19, 25, and 32 and related dependent claims be allowed.

In the Office Action, at page 6, claims 3, 9, 15, 21, 27, 34, 39, 40, 42, and 45-47 were rejected under 35 U.S.C. § 103 in view of Malik and U.S. Patent No. 6,438,556 to Benveniste ("Benveniste"). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Because claims 3, 9, 15, 21, 27, and 34 depend from independent claims 1, 7, 13, 19, 25, and 32, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claims 1, 7, 13, 19, 25, and 32 in view of Malik are incorporated herein.

Referring to independent claims 39, 40, and 47, as previously set forth, Malik is silent as

to providing, "a reading process section . . . an original file being divided into a plurality of sections and compressed for each section using the plurality of compression parameters so as to obtain a plurality of section data forming the compressed file and the address information corresponding to a plurality of sections . . . wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data," as recited in independent claims 39, 40, and 47. Rather, Malik provides code words, each corresponding to a segment. The method of Malik also provides a representation of the data, where the code words in the representation replace the segments, allowing the data to be access randomly. See abstract of Malik. However, nothing is taught or suggested in Malik where "each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data," as recited in independent claims 39, 40, and 47.

Referring to Benveniste, this reference provides a FIFO implementation and determining whether a directory index for a segment is currently stored in the FIFO or not. See column 5, lines 57-67 of Benveniste. Also, Benveniste provides indicating the status of a segment with respect to its membership in a virtual uncompressed cache. In a case that the uncom0pressed flag is set to uncompressed, the remaining flags are unused and available for other uses. See column 6, lines 1-10 of Benveniste. However, similarly to Malik, Benveniste fails to teach or suggest, "dividing data and index data into a plurality of sections, wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Further, the cited reference is silent as to teaching or suggesting that "each of the sections comprises the data and the index data, and the data comprises at least one of text data, image data, and audio data," as recited in independent claim 1. Thus, assuming, arguendo, that Malik and Benveniste were combined, the combination thereof would fail to teach or suggest all the claimed features recited in independent claim 1.

Because independent claims 7, 13, 19, 25, 32, 39, 40, and 47 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7, 13, 19, 25, 32, 39, 40, and 47. It is respectfully requested that independent claims 1, 7, 13, 19, 25, 32, 39, 40, and 47 and related dependent claims be allowed.

*In the Office Action, at page 7, claims 27, 34, and 42 were rejected under 35 U.S.C. §
103 in view of Malik and U.S. Patent No. 6,438,556 to Ikegami ("Ikegami") and, at page 9,
claims 5, 11, 17, 23, 29, and 36 were rejected under 35 U.S.C. § 103 in view of Malik and
Ikegami. The reasons for the rejection are set forth in the Office Action and therefore not
repeated. The rejection is traversed and reconsideration is requested.*

Because claims 5, 11, 17, 23, 27 and 29, 34 and 36, and 42 depend from independent
claims 1, 7, 13, 19, 25, 32, and 40, respectively, all the claimed features of the independent
claims must be shown in the cited references individually or combined. The arguments provided
above supporting the patentability of independent claims 1, 7, 13, 19, 25, 32, and 40 in view of
Malik and Benveniste are incorporated herein.

Referring to Ikegami, this reference provides a description of the conventional Huffman
coding method. See column 1, lines 52-67 of Ikegami. Further, when input data including a
symbol string is compressed, bit maps are used. See abstract, column 17, lines 56-67, and
column 18, lines 7-17 of Ikegami. In each bit map, "1" is set to a bit that represents the position
of a relevant symbol of the symbol string. In contrast, "0" is set to a bit that represents the
position of another symbol of the symbol string. However, similarly to Malik, Ikegami fails to
teach or suggest, "dividing data and index data into a plurality of sections, wherein the index
data is different from and corresponds to the data and is used to search or retrieve the data and
each of the sections," as recited in independent claim 1. Further, the cited reference is silent as
to teaching or suggesting that "each of the sections comprises the data and the index data, and
the data comprises at least one of text data, image data, and audio data," as recited in
independent claim 1. Thus, assuming, *arguendo*, that Malik, Benveniste, and Ikegami were
combined, the combination thereof would fail to teach or suggest all the claimed features recited
in independent claim 1.

Because independent claims 7, 13, 19, 25, 32, 39, and 40 include similar claim features
as those recited in independent claim 1, although of different scope, the arguments presented
above supporting the patentability of independent claim 1 are incorporated herein to support the
patentability of independent claims 7, 13, 19, 25, 32, 39, and 40. It is respectfully requested that
independent claims 1, 7, 13, 19, 25, 32, 39, and 40 and related dependent claims be allowed.

*In the Office Action, at page 12, claim 41 was rejected under 35 U.S.C. § 103 in view of
Malik, Benveniste, and Ikegami. The reasons for the rejection are set forth in the Office Action
and therefore not repeated. The rejection is traversed and reconsideration is requested.*

Because claim 41 depends from independent claim 40, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claim 41 in view of <u>Malik</u>, <u>Benveniste</u>, and <u>Ikegami</u> are incorporated herein. Accordingly, it is respectfully requested that independent claim 40 and related dependent claim 41 be allowed.

In the Office Action, at page 13, claim 43 was rejected under 35 U.S.C. § 103 in view of Malik, Benveniste, and Ikegami. The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Because claim 43 depends from independent claim 40, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claim 43 in view of <u>Malik</u>, <u>Benveniste</u>, and <u>Ikegami</u> are incorporated herein. Accordingly, it is respectfully requested that independent claim 40 and related dependent claim 43 be allowed.

CONCLUSION:

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot, and further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance, which action is earnestly solicited.

If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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